

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VICTORIA EVANOFF, as Administrator of the ESTATE OF JOHN EVANOFF, DECEASED	:	CIVIL ACTION
	:	
	:	No. 5:23-cv-03417-JFL
Plaintiff,	:	
	:	
vs.	:	
	:	
MARSH USA, LLC,	:	
	:	
THERESE PERRETTE, and	:	
	:	
JOHN DOE DEFENDANTS # 1-2	:	
	:	
Defendants.	:	
	:	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

AND NOW, Defendants Marsh USA, LLC (“Marsh USA”) and Therese Perrette (together, “Defendants”), by and through their undersigned counsel, Goldberg Segalla LLP, respectfully submit the within Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56.

A Statement of Undisputed Material Facts, Brief, Exhibits, and Proposed Order are being filed herewith and are incorporated herein by reference.

WHEREFORE, Defendants respectfully request that the Court enter Order, substantially in the form appended hereto, granting Defendants’ Motion for Summary Judgment, entering judgment in favor of Defendants and against Plaintiff, and directing the Clerk of Court to mark this action as closed.

Respectfully submitted,

Dated: February 5, 2024

GOLDBERG SEGALLA LLP

/s/ Michael P. Luongo

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Attorneys for Defendants

Marsh USA, LLC and Therese Perrette

CERTIFICATE OF NON-CONCURRENCE

I, Michael P. Luongo, Esq., hereby certify that I contacted counsel for Plaintiff regarding possible concurrence with Defendants' Motion for Summary Judgment and that Plaintiff's counsel indicated non-concurrence with Defendants' Motion for Summary Judgment.

s/ Michael Luongo
Michael P. Luongo, Esq.

Dated: February 5, 2024

CERTIFICATE OF SERVICE

I, Michael P. Luongo, Esq., hereby certify that a true and correct copy of the forgoing Motion for Summary Judgment was served on all counsel of record via ECF on the date below.

s/ Michael Luongo
Michael P. Luongo, Esq.

Dated: February 5, 2024